HONORABLE RICHARD A. JONES 1 2 3 4 5 6 7 8 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 9 AT SEATTLE 10 UNITED STATES OF AMERICA, Case No. CR 18-0092-RAJ 11 Plaintiff. DECLARATION OF ANGELO J. 12 CALFO IN SUPPORT OF BERNARD v. ROSS HANSEN'S MOTION IN LIMINE 13 BERNARD ROSS HANSEN, and TO EXCLUDE LEGAL OPINIONS DIANE RENEE ERDMANN, 14 Defendants. 15 16 17 I, Angelo J. Calfo, declare as follows: 18 I am an attorney with Calfo Eakes LLP and I represent Bernard Ross Hansen in the 19 above-captioned case. I am over eighteen years of age and am competent to testify herein. I make 20 the following statements based on my personal knowledge. 21 2. Attached hereto as Exhibit A is a true and correct copy of the Government 22 Preliminary Witness List dated June 21, 2019. 23 3. Attached hereto as Exhibit B is a true and correct copy of a memorandum from Greg Fullington to Ross Hansen dated September 28, 2015, Bates numbered FBI302 007372–77, 25 that is included in the government's exhibit list. LAW OFFICES DECLARATION OF ANGELO J. CALFO IN SUPPORT CALFO EAKES LLP OF HANSEN'S MOTION IN LIMINE TO EXCLUDE 1301 SECOND AVENUE, SUITE 2800 SEATTLE, WASHINGTON 98101 TEL (206) 407-2200 FAX (206) 407-2224 LEGAL OPINIONS (Case No. CR 18-0092-RAJ) - 1

1	4. Attached hereto as Exhibit C is a true and correct copy of a letter from Greg
2	Fullington to Ross Hansen re Resignation of Greg Fullington, dated October 16, 2015, Bates
3	numbered FBI302_007378, that is included in the government's exhibit list.
4	5. Attached hereto as Exhibit D is a true and correct copy of a memorandum from
5	Catherine Hopkins re Discussion w/Ross, Storage/Lease Administration, dated August 29, 2011,
6	Bates numbered FBI302_000074–76, that is included in the government's exhibit list.
7	6. Attached here to as Exhibit E is a true and correct copy of a letter from my office
8	to the government regarding privilege issues, dated November 10, 2020.
9	7. On March 31, 2021, I participated in a meet-and-confer session with the
10	government. The government confirmed during the discussion on this motion that it did not plan
11	to call any legal experts at trial, but nevertheless planned to call former lawyers for Northwest
12	Territorial Mint and to introduce exhibits containing opinions of those lawyers. When asked to
13	provide a basis for admitting those opinions, the government said that they went to Mr. Hansen's
14	intent.
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16	DATED this 19 th day of April, 2021 at Seattle, Washington.
17	a/Accala I Calla
18	s/Angelo J. Calfo ANGELO J. CALFO
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	DECLARATION OF ANGELO J. CALFO IN SUPPORT LAW OFFICES CALED FAKES LIP

DECLARATION OF ANGELO J. CALFO IN SUPPORT OF HANSEN'S MOTION IN LIMINE TO EXCLUDE LEGAL OPINIONS (Case No. CR 18-0092-RAJ) - 2 LAW OFFICES

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